

April 3, 2002

Magalie Roman Salas, Office of the Secretary Federal Communications Commission 445 12th Street S.W., Suite TW-A325 Washington, DC 20554

RE: Comments relating to CC Docket No. 02-6

To Whom It May Concern:

In response to the FCC Notice of Proposed Rule Making and Order (CC Docket No. 02-6), Richardson Associates – Electronics would like to make a few comments. Particularly, we would like to comment on the treatment of funds left unused at the end of a Funding Year. It is our belief that the E-Rate program has been established to assist schools and libraries to obtain technology that would otherwise not be attainable and also to provide relief on their current telecommunications and Internet charges so they may use that relief to advance technologically.

With that in mind, the E-Rate program should be focused so that the primary benefits go to the recipients of the program. While the annual allowance of \$2.25 billion is generous, it is not being fully utilized. With the current trend of disbursement, there are so many requests for Internal Connection funding that only the 90% schools and libraries are being offered financial assistance. Allowing for unused funds from previous years to be utilized, opportunities to fund down to lower percentages could be afforded.

A further suggestion would be to rotate the allowance of participation of 90% schools. For example, a 90% school receiving benefit for Internal Connections one year would not be able to receive benefits the following year. Therefore, opportunities would be provided for other schools and libraries with economic need below the 90% level to benefit from the program.

While we are sympathetic to the small businesses that are contributors to the program, their contribution level would not increase by using this option. It would require the same contribution that was assumingly determined as fair at the inception of the program. Weighing that with the potential benefits of being able to expand the scope of schools and libraries receiving aid, the solution seems apparent. It is imperative that our schools and libraries be able to provide modern day technology to prepare our students and community for the future.

Sincerely,

Richardson Associates - Electronics